

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

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EMPIRE J INC.,

Plaintiff,

-against-

ARMAN JEWELERS, INC., RAZAQ, ABDUL
MOHAMMAD, IMRAN HUSSAIN, ARMAN TRADERS, INC.
ARMAN & AYAN TRADING INC.

Defendants.
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SUMMONS

Plaintiff designates Queens County
as the place of trial

Basis of Venue:

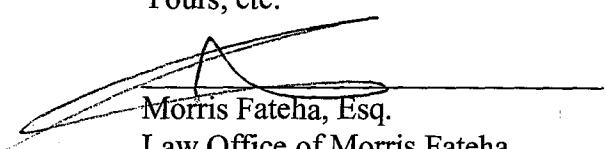
Defendant's Place of Business
37-35 74th Street
Jackson Heights, New York 11372

To the above named Defendants:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff(s) Attorney within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Brooklyn, New York
December 31, 2015

Yours, etc.


Morris Fateha, Esq.
Law Office of Morris Fateha
Attorneys for Plaintiff
911 Avenue U
Brooklyn, New York 11223
(718) 627-4600

DEFENDANT(S) ADDRESS(ES):

ARMAN JEWELERS, INC.
37-35 74th Street
Jackson Heights, New York 11372

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

-----X
EMPIRE J. INC,

Plaintiff,

VERIFIED COMPLAINT

-against-

ARMAN JEWELERS, INC., RAZAQ, ABDUL
MOHAMMAD, IMRAN HUSSAIN, ARMAN TRADERS, INC.
ARMAN & AYAN TRADING INC.

Defendants.
-----X

Plaintiff, by its attorney, Law Office of Morris Fateha, complaining of Defendant, respectfully alleges as follows, upon information and belief:

1. Plaintiff is a domestic corporation.
2. Defendant Arman Jewelers, Inc. is a domestic corporation formed under the laws of the State of New York.
3. Defendant Razaq is an individual resident of the State of New York.
4. Defendant Abdul Mohammad is an individual resident of the State of New York.
5. Defendant Imran Hussain is an individual resident of the State of New York.
6. Defendant Arman Traders, Inc. is a domestic corporation formed under the laws of the State of New York.
7. Defendant Arman & Ayan Trading, Inc. is a domestic corporation formed under the laws of the State of New York.
8. The above-named defendants are collectively referred to as the "Defendants."

AS AND FOR A FIRST CAUSE OF ACTION

9. Plaintiff was and is entitled to the immediate possession of the below-described property (the “Collateral”), by virtue of a special property interest arising by reason of the following facts:

- a. Prior to October 30, 2015, Defendants became indebted to Plaintiff.
- b. In connection with that debt, certain items of jewelry were used as collateral for the debt.
- c. Specifically, on or about October 30, 2015, certain items of jewelry detailed in “Memorandum 2172,” a copy of which is annexed hereto as **Exhibit A**, were agreed to be collateral. These items included two 22 karat items.
- d. Next, on or about November 5, 2015, certain items of jewelry detailed in “Memorandum 2178,” a copy of which is annexed hereto as **Exhibit B**, were agreed to be collateral. These items included two 22 karat items.
- e. Next, on or about November 12, 2015, certain items of jewelry detailed in “Memorandum 2183,” a copy of which is annexed hereto as **Exhibit C**, were agreed to be collateral. These items included two 22 karat items.
- f. Finally, on or about November 25, 2015, certain items of jewelry detailed in “Memorandum 2192,” a copy of which is annexed hereto as **Exhibit D**, were agreed to be collateral. These items included two 22 karat items.

10. The items listed in the foregoing paragraphs are collectively referred to as the “Collateral.”

11. Plaintiff’s security interest is evidenced by the four Memoranda annexed as **Exhibits A through D**.

12. As of the present time, Defendants have failed, neglected and refused to pay their debt or return the Collateral and, accordingly, Plaintiff is now entitled to immediate possession of the Collateral.

13. The actual value of the Collateral transferred by Plaintiff to Defendant equals \$205,756.00.

14. Prior to the commencement of this action, Plaintiff duly demanded payment of the debt and possession of the Collateral from Defendants and Defendants have failed, refused and neglected to deliver same to Plaintiff. Evidence of this demand, and Defendants' receipt thereof, is contained in the letter annexed hereto as **Exhibit E**, where Defendants admit the money owed to Plaintiff.


15. Upon information and belief, Defendants are secreting the Collateral.

16. By virtue of the foregoing acts, conduct and omissions on the part of Defendants, Plaintiff is entitled to immediate possession of the Collateral.

WHEREFORE, Plaintiff demands a judgment against Defendants for immediate possession of the above-mentioned Collateral, plus such other and further relief as this Honorable Court deems just and proper.

Dated: Brooklyn, New York
December 31, 2015

Yours, etc.



Morris Fateha, Esq.
Law Office of Morris Fateha
Attorneys for Plaintiff
911 Avenue U
Brooklyn, New York 11223
(718) 627-4600

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

-----X
EMPIRE J. INC,

Plaintiff,

VERIFICATION

-against-

ARMAN JEWELERS, INC., RAZAQ, ABDUL
MOHAMMAD IMRAN HUSSAIN, ARMAN TRADERS, INC.
ARMAN & AYAN TRADING INC.

Defendant.
-----X

STATE OF NEW YORK

ss.:

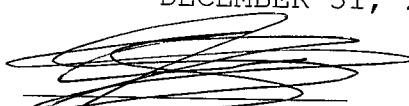
COUNTY OF KINGS

Sami Jajati, being duly sworn, deposes and says:

I am the Plaintiff in the within action; I have read the foregoing verified Complaint and know the contents thereof; and that the same is true to my own knowledge except as to those matters alleged upon information and belief and as to those matters I believe them to be true.

Dated: Brooklyn, New York

DECEMBER 31, 2015


Sami Jajati

Notary Signature

MORRIS FATEHA
NOTARY PUBLIC
STATE OF NEW YORK
QUALIFIED IN KINGS COUNTY
REGISTRATION NUMBER: 02FA6196442
COMMISSION EXPIRES: 11/17/2016

SWORN TO BEFORE ME THIS 31st DAY OF
December, 2015

MORRIS FATEHA
NOTARY PUBLIC
STATE OF NEW YORK
QUALIFIED IN KINGS COUNTY
REGISTRATION NUMBER: 02FA6196442
COMMISSION EXPIRES: 11/17/2016